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May 12, 2021

VIA ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Sanchez v. BitPay, Inc., Case No. 1:21-cv-02282-KPF

Dear Judge Failla:

We represent defendant BitPay, Inc. ("Defendant") in the above-referenced matter. Together with counsel for plaintiff Cristian Sanchez, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from May 12, 2021 to June 28, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

/s/ Timothy J. Straub
Timothy J. Straub

cc: All counsel of record (by ECF)